

Washington Office of Insurance Commissioner

2004 Electronic Submission Directive

Electronic Filings in 2004

All OIC FTP filings must comply with the NAIC Instructions for Electronic Filing Submissions (NAIC Instructions) and this OIC Directive. Terms in bold italic font are defined by the NAIC Instructions. The 2004 NAIC file naming conventions are expanded for PDF, TXT and ZIP files.

Same FTP Password

The 2004 user ID and password will remain the same as 2003. The OIC expects the FTP site will begin accepting 2003 annual statements on February 3, 2004.

OIC Changes for 2004

- We require all NAIC TXT files, such as the ***S***, ***V*** and ***E***.
- Title insurers have a ***Filing BLOB Type Code*** for Business Written by Agency.
- The domestic RBC PDF file ***Submission Group Type Code*** must be "R".
- Washington-specific codes follow the NAIC changes.

Washington-Specific ***Filing BLOB Type Codes***

The following documents MUST NOT be filed with the NAIC. Because of this, the NAIC did not create file names for these documents. Therefore, these PDF and TXT file naming conventions are only for Washington.

<i>Sub- mission Group Type Code</i>	<i>State Supple- ment Code</i>	<i>Filing BLOB Type Code</i>	Description
M	WA	PC	Supplemental Compensation Exhibit
M	WA	PD	Additional Data to the Annual Statement (HCSCs and HMOs only)
M	WA	PU	RCW 48.43.045(2) report (HCSCs and HMOs only)
R	WA	PR	Risk-Based Capital report (Domestic only)
A	WA	PT	Business written by Agency (Title only) (New)
J	WA	PQ	CPA qualifications letter
J	WA	PE	CPA report on significant internal control deficiencies (if issued)
matches the PDF files	WA	EM	Response Back E-Mail Address List (.TXT file)

The rest of the file name ***fields*** will follow the NAIC file naming conventions. Examples:

99999_01_x_2003_o_m_01_0_wa_pc.pdf
99999_86_L_2003_O_R_01_0_WA_PR.PDF
99999_99_p_2003_o_m_01_0_wa_em.txt

OIC 2004 Electronic Submission Directive

All TXT and PDF files that the NAIC has assigned a **Filing BLOB Type Code** MUST use the **State Supplement Code** of "NA". Your annual statement preparation software should automatically name all NAIC-required documents with the proper file names.

For filings with the OIC, companies may put TXT and PDF files with both "NA" and "WA" into one ZIP file. The ZIP file may use either "NA" or "WA" as its **State Supplement Code**.

Confirmation of Receipt

When a reporting entity includes a "WA_EM" text file, the OIC processing system will automatically generate an official e-mail positive response. This e-mail will list the PDF and TXT files accepted and/or rejected or will explain why a filing is rejected. Please refer to the separate "WA_EM" instructions on the OIC website.

Signatures

Washington regulations allow a CHOICE between electronic signature verification or a paper copy of the signatures and Jurat page.

If using electronic signatures to sign PDF files, the digital signatures must be from a Certificate Authority with a valid license under Chapter 19.34 RCW. You may view the list of licensees at <http://www.secstate.wa.gov/ea/>.

If your company chooses paper signatures, please ensure it timely files the paper signature pages in accordance with Washington Administrative Code 284-07-050(4)(e), WAC 284-07-060(2)(c) and WAC 284-07-100(7).

The following documents must have signatures, whether digital or paper:

- All Jurat pages (including the domestic RBC Report)
- SVO Compliance Certifications
- Actuarial Opinions/Certifications
- officers or others affirming accuracy of the underlying listing or summaries provided to the actuary
- audited financial statements
- CPA qualifications letter
- CPA report on significant internal control deficiencies (if issued)

Your annual statement software will separate the Annual Statement into three PDF files. If the company chooses to use digital signatures, each PDF file must be signed. If the company instead sends a paper signature page, one Jurat page will cover the three PDF files.

We do not accept the NAIC affidavit of filing in lieu of the Jurat page.

Summary of the NAIC Electronic Requirements:

Reporting entities are required to file viewable and printable images of financial statements and supplement documents in PDF files. **For the OIC, this means companies may not scan documents into PDF files because the images are not clearly readable.**

All TXT and PDF files must be submitted as component files within a ZIP file.

Each ZIP filing must have a unique file name.

Companies may not mix different [Submission Filing Type Codes](#) or [Submission Group Type Codes](#) into one ZIP file.

After a TXT or PDF file is submitted (and accepted) subsequent filings must have a [Submission Group Type Codes](#) of "A", which means "amended". **A company must NOT file a second "O" (Original) file with the OIC.**

Typical Errors:

Presuming the "transfer complete" message means the OIC accepted the filing when it only means the filing left your computer. Some insurers have found firewalls have blocked the filing from leaving the company while others have sent unreadable corrupt filings. Only the "WA_EM" file provides an official positive e-mail confirmation of receipt.

Failing to zip the TXT and PDF files into a ZIP file.

Inventing file names instead of following the file naming conventions.

Placing a zero in the [Submission Filing Type Code](#) instead of an "o" .

Filing with the incorrect [Submission Group Type Code](#). PDF files with the incorrect [Submission Group Type Code](#) remain outstanding, regardless if the system accepts an incorrectly-named filing. it. For example, filing the CPA qualifications letter with a [Submission Group Type Code](#) other than "J".

NAIC Re-filing requests: This is typically due to problems reading the data text file (...S.TXT file). If the PDF files are not affected or changed, do not make a re-filing with the OIC.